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18 *Attorneys for Defendants City of Henderson, Richard  
 19 Derrick, Bristol Ellington, Nicholas Vaskov, and Kristina  
 20 Escamilla Gilmore*

21 **UNITED STATES DISTRICT COURT**  
 22  
**DISTRICT OF NEVADA**

23 LATESHA WATSON,  
 24 Plaintiff  
 25 v.  
 26 CITY OF HENDERSON et al.,  
 27 Defendants

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO RESPOND TO  
 PLAINTIFF'S MOTION FOR  
 RECONSIDERATION AND FIRST  
 AMENDED COMPLAINT**  
**(FIRST REQUEST)**

28 Plaintiff Latesha Watson (“Plaintiff”) and Defendants City of Henderson, Richard Derrick,  
 29 Bristol Ellington, Nicholas Vaskov, Kristina Escamilla Gilmore, Kevin Abernathy, Kenneth Kerby,  
 30 Richard McCann (“Defendants”) (collectively, the “Parties”), through their undersigned counsel,  
 31 for good cause shown, hereby stipulate to extend Defendants’ deadline to respond to Plaintiff’s  
 32 Motion for Reconsideration (the “Motion”) [ECF No. 92] to December 3, 2021, Plaintiff’s reply to  
 33 December 20, 2021 and to extend Defendants’ deadline to respond to Plaintiff’s First Amended  
 34 Complaint to January 14, 2022 for the following reasons:  
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1       1. On September 23, 2021, this Court granted Defendants' motion to dismiss in part  
2 and gave Plaintiff leave to amend her complaint by October 15, 2021, which this Court later  
3 extended to November 1, 2021.

4       2. After this Court granted the motion, Magistrate Judge Brenda Weksler lifted the  
5 temporary stay on discovery and ordered the parties to meet and confer to file a joint proposed  
6 discovery plan and scheduling order.

7       3. On October 19, 2021, the magistrate judge granted the amended joint discovery plan  
8 and scheduling order.

9       4. Plaintiff filed her motion for reconsideration and an amended complaint on  
10 November 1, 2021, triggering a deadline for the Defendants to respond to both the Motion and the  
11 amended complaint on November 15, 2021.

12       5. Counsel requires additional time to prepare the appropriate responses to the Motion  
13 and to the amended complaint given the number of defendants, discovery deadlines, the nature of  
14 the dispute, and the upcoming holidays.

15       6. The Parties agreed to the extensions requested herein.

16       7. This extension request is sought in good faith and is not made for the purpose of  
17 delay.

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1 Therefore, the Parties respectfully request an extension for Defendants to respond to  
2 Plaintiff's Motion for Reconsideration up to and including December 3, 2021, with Plaintiff's reply  
3 due on or before December 20, 2021. The Parties also respectfully request an extension for  
4 Defendants to respond to Plaintiff's amended complaint up to and including January 14, 2022.

6 | DATED this 11th day of November 2021.

DATED this 11th day of November 2021.

SNELL & WILMER L.L.P.

COOK & KELESIS, LTD.

8 | /s/

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*Attorneys for Plaintiff Latesha Watson*

16 | DATED this 11th day of November 2021.

17 | CLARK HILL PLLC

18 | /s/ Nicholas M. Wieczorek

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*Attorneys for Defendants Kevin Abernathy,  
Richard McCann, and Kenneth Kerby*

## IT IS SO ORDERED.

DATED: November 12, 2021.

UNITED STATES DISTRICT COURT JUDGE